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DOCKET ROOM

ENERGY & WATER DIVISION

Mr. Dave McClanahan  
Energy and Water Division  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

03-00189

Dear Mr. McClanahan,

Enclosed is Atmos' response to Staff's Data Request of March 4, 2003 relative to our filing requesting Commission approval to implement estimated meter readings.

1. The current tariff, concerning estimated bills, has been in place for several years. Why do you feel that you need to revise it?

Response

The Company continues to pursue efficiencies in its operations across all its service areas. By utilizing limited estimated billing, the Company will be able to utilize its resources more efficiently during peak periods, such as fall "light ups," heavy construction schedules, heavy service calls or to accommodate bad "weather" schedules. Please see Response to #3.

2. Your current tariff reads that "the Company will not render an estimated bill to a Customer except for good cause where the meter could not be read or was improperly registering". It states in your letter that "That the proposed change will allow the Company to render estimated bills under ordinary circumstances...". Provide explanation, **in detail**, of your intentions under the proposed tariff.

Response

Meters are presently read each month unless good cause exists for estimation, (i.e. inclement weather, no access to meter such as locked gates, etc. and vicious dogs). The Company is proposing and plans to estimate meter readings on a limited and rotating number of cycles each month. There are approximately 20 cycles read and billed each month. Only a few customers will receive more than two estimated bills per year. "Estimate" will appear on the bill and the Company will offer to read any meter for which a customer has raised a billing issue.

3. Also please explain the "current conflicting language in Paragraph 4.3 of 1<sup>st</sup> Revised Sheet No. 57".

Response

The first paragraph restricts estimated meter reading **ONLY IN THE EVENT OF GOOD CAUSE** . . . . The second paragraph, however, allows estimated meter reading under **ORDINARY CIRCUMSTANCES** to the extent that a customer does not receive two consecutive estimated bills. The "ONLY IN THE EVENT OF GOOD CAUSE" and "UNDER ORDINARY CIRCUMSTANCES" conflict. By amending the current language, the Company is clarifying the intended practice.

4. You quote Rule 1220-4-5-. 09 which states that "meters shall be read monthly except that **Authority** may be obtained from the Commission for reading the meters at other than monthly intervals. Please explain how the Company's intends to comply with this rule.

Response

The Company is amending its current tariff seeking Commission approval to begin implementing its' proposal to estimate meter readings on a routine basis.

If you require any further information, please do not hesitate to contact me at 615-771-8332 or by e-mail at [Patricia.Childers@atmosenergy.com](mailto:Patricia.Childers@atmosenergy.com). Thank you for your consideration.

Sincerely,



Patricia J. Childers,  
VP - Rates & Regulatory Affairs

Cc: Joe Conner  
Jean Curran, Consumer Services  
Jon Wike, Counsel